

FILED

10 JUN -7 PM 3:11

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRIAN R. WILSON,

Defendant.

INFORMATION

4:10 CR 252

CR. NO.

Title 29, United States Code  
Section 501(c)

JUDGE ADAMS

The United States Attorney charges:

1. At all times relevant to this Information, the American Federation of State, County, and Municipal Employees, AFL-CIO, Local Union 2804 ("AFSCME Local 2804" or "local union"), was a labor organization engaged in an industry affecting commerce, within the meaning of Sections 402(i) and (j) of Title 29, United States Code. AFSCME Local 2804 represented hospital service workers employed at Forum Health Trumbull Memorial Hospital in Warren, Ohio.

2. At all times relevant to this Information until March 2007, the defendant, BRIAN R. WILSON, was the Secretary-Treasurer of AFSCME Local 2804. As Secretary-Treasurer, he was entrusted with the responsibility for maintaining the integrity of the funds belonging to the local union. He maintained the local union's financial records, including the check book for the

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local union's one checking account. The local union's constitution required that all disbursements be made by check, signed by two officers. In addition, local union procedures required that disbursements over \$100 had to be approved by the local union's executive board and presented at the next membership meeting. In March 2007, the defendant resigned from the local union after taking a management position.

3. During the period from approximately April 29, 2006, through November 27, 2006, the defendant made seven unauthorized cash withdrawals from the local union's checking account, totaling \$11,030. He spent approximately \$530 for local union expenses and kept the rest for unauthorized personal use. He did not seek approval or inform any other officers or members that he had taken this money. He also did not disclose the withdrawals in early 2007 when other local union officers requested records and information to conduct an audit of the local union's finances.

5. From on or about April 29, 2006, through on or about November 27, 2006, in the Northern District of Ohio, Eastern Division, the defendant, BRIAN R. WILSON, while an officer, that is, Secretary-Treasurer of AFSCME Local 2804, did embezzle, steal and unlawfully and willfully abstract and convert to his own use and the use of another the moneys, funds, and assets of said labor organization in the approximate amount of \$10,500.

In violation of Title 29, United States Code, Section 501(c).

  
STEVEN M. DETTELBACH  
United States Attorney